

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

HUGHETTE CRUMPLER,	)	CASE NO. C-1-02-131
	)	
Plaintiff,	)	JUDGE SUSAN J. DLOTT
	)	
vs.	)	
	)	
TELXON CORPORATION, et al.,	)	
	)	
Defendants/Third-Party	)	TELXON CORPORATION AND
Plaintiffs,	)	SYMBOL TECHNOLOGIES, INC.'S
	)	RULE 26(a)(1) INITIAL
	)	DISCLOSURES
vs.	)	
	)	
JOHN W. PAXTON, SR.,	)	
	)	
Third-Party Defendant.	)	

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Telxon Corporation and Symbol Technologies, Inc. (collectively "Defendants") submit the following initial disclosures to Plaintiff Hughette Crumpler ("Plaintiff"):

**A. Individuals or Entities Likely to Have Discoverable Information**

The following individuals or entities are likely to have discoverable information relevant to the Complaint, Counterclaim, and Third-Party Complaint. These initial disclosures will be supplemented if additional information is obtained through discovery.

1. **John W. Paxton**  
5697 State Route 132  
Batavia, OH 45103

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint.

**Exhibit A**

2. **Hughette Crumpler**  
648 West Wllington, Apt.2-W  
Chicago, Ill. 60657

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint.

3. **Richard J. Bogomolny**  
530 Battles Road  
Gates Mills, OH 44040  
(440) 423-1519

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

4. **Norton W. Rose**  
Kenzer Corporation  
3601 Green Rd., Suite 310  
Beachwood, OH 44122  
(216) 595-6585

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

5. **Dr. Raj Reddy**  
Carnegie Mellon University  
5325 Wean Hall  
Pittsburgh, PA 15213  
(412) 268-2598

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

6. **John H. Cribb**  
J.H.C. Consulting  
Harbourside House  
94 Panorama Road  
Sandbanks  
Poole, Dorset BH137RG  
United Kingdom  
(011) 44-1202-707-597

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

7. **Robert A. Goodman**  
28726 Gates Mills Blvd.  
Pepper Pike, OH 44124  
(216) 831-2417

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

8. **R.D. Garwood**  
8400 Jett Ferry Road  
Atlanta, GA 30350  
(770) 668-9068

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

9. **L. Michael Hone**  
7 Bobby Jones Drive  
Andover, MA 01810  
(978) 475-9865

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

10. **Jonathon R. Macey**  
28 Renwick Heights Road  
Ithaca, NY 14850  
(607) 272-0366

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

11. **Frank E. Brick**  
10 Summer Port  
Woodlands, TX 77381

(281) 364-1204

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Telxon's corporate policy with respect to severance packages and the authority of the Chief Executive Officer.

12. **Gerald Gabriel**  
2694 Sanctuary Drive  
Akron, OH 44333  
(330) 664-2216

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Plaintiff's employment history with Telxon.

13. **Gary L. Grand**  
530 Park Ridge Drive  
Munroe Falls, OH 44262  
(330) 688-0747 Home

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, Plaintiff's employment history with Telxon.

14. **Leonard H. Goldner**  
**Bob Bradshaw**  
**Cecile Hickman**  
Symbol Technologies, Inc.  
One Symbol Plaza  
Holtsville, NY 11742  
(631) 738-2400

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, the terms of the merger agreement and Paxton and Crumpler's conduct after the merger agreement was signed.

15. **Tomo Razmilovic**  
c/o Jon J. Pinney  
Goodman Weiss Miller LLP  
100 Erieview Plaza, 27<sup>th</sup> Floor  
Cleveland, Ohio 44114

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint, specifically including, but not limited to, the terms of the merger agreement and Paxton and Crumpler's conduct after the merger agreement was signed.

16. **Meg Pais**  
c/o Jon J. Pinney  
Goodman Weiss Miller LLP  
100 Erieview Plaza, 27<sup>th</sup> Floor  
Cleveland, Ohio 44114

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint.

17. **Lisa McManis**  
c/o Jon J. Pinney  
Goodman Weiss Miller LLP  
100 Erieview Plaza, 27<sup>th</sup> Floor  
Cleveland, Ohio 44114

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint.

18. **Glenn Hansen**  
c/o Jon J. Pinney  
Goodman Weiss Miller LLP  
100 Erieview Plaza, 27<sup>th</sup> Floor  
Cleveland, Ohio 44114

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint.

19. **Beth Staples**  
c/o Jon J. Pinney  
Goodman Weiss Miller LLP  
100 Erieview Plaza, 27<sup>th</sup> Floor  
Cleveland, Ohio 44114

Subject: All allegations in the Complaint, Counterclaim, and Third-Party Complaint.

**B. Identification of Documents**

Attached hereto are copies of all documents, data compilations, and tangible things that are in the possession, custody, or control of the Defendants and that the Defendants may use to support their claims or defenses.

**C. Computation of Damages**

Defendants have not determined, at this time, the amount of damages that Defendants have suffered as a result of Plaintiff's fraudulent course of conduct, as alleged in Defendants' Counterclaim. Consistent with the Federal Rules of Civil Procedure, Defendants will supplement their response hereto.

**D. Insurance**

There is no insurance coverage that will satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

OF COUNSEL:

GOODMAN WEISS MILLER LLP



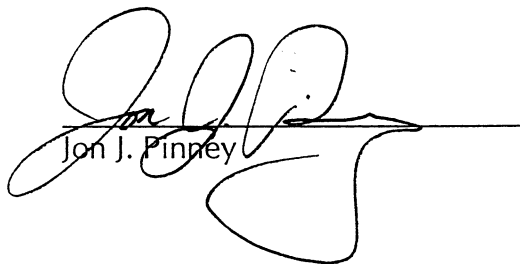
JAMES S. WERTHEIM (0029464)  
KIMBERLY Y. SMITH (0066849)  
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100 Erieview Plaza, 27th Floor  
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smith@goodmanweissmiller.com  
pinney@goodmanweissmiller.com

**Counsel for Defendants Telxon Corporation  
and Symbol Technologies, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2002, a copy of Telxon Corporation and Symbol Technologies, Inc.'s Initial Disclosures to Plaintiff Hughette Crumpler was sent via overnight mail to:

ROBERT A. McMAHON  
EBERLY McMAHON HOCHSCHEID LLC  
3700 Eastern Avenue  
Cincinnati, OH 45226



Jon J. Pinney